

LINER FREEDMAN TAITELMAN + COOLEY, LLP
ATTORNEYS AT LAW

1801 CENTURY PARK WEST, 5TH FLOOR
LOS ANGELES, CALIFORNIA 90067-6007
TEL: (310) 201-0005
FAX: (310) 201-0045
E-MAIL: jsunshine@lftcllp.com

JASON SUNSHINE

July 14, 2025

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

Re: *Liner Freedman Taitelman + Cooley, LLP v. Blake Lively*, No. 1:25-mc-00289-LJL

Dear Judge Liman:

Liner Freedman Taitelman + Cooley, LLP (“LFTC”) responds to the Court’s July 10, 2025 order to show cause “why the motion to quash should not be decided based on the joint stipulation submitted in the Central District of California” (Dkt. No. 1-1) as follows. LFTC does not object to the Court proceeding on the joint stipulation re Motion to Quash Subpoena submitted in the Central District of California if the Court is referring to the Joint Stipulation, the accompanying Declarations and exhibits (Dkt. Nos. 1-2 through 8) and the Parties’ Supplemental Memorandum (Dkt. Nos. 7, 15). LFTC, however, respectfully requests that the Court reserve any determination on whether to conduct oral argument until the Court has reviewed the relevant documents and determines that it has no further questions for the parties.

Respectfully submitted,

/s/Jason Sunshine

LINER FREEDMAN TAITELMAN + COOLEY, LLP

Bryan J. Freedman*

Ellyn S. Garofalo*

Amir Kaltgrad*

Jason Sunshine

1801 Century Park West, 5th Floor

Los Angeles, CA 90067

Tel: (310) 201-0005

Email: bfreedman@lftcllp.com

egarofalo@lftcllp.com

akaltgrad@lftcllp.com

jsunshine@lftcllp.com

*Pro Hac Vice Application forthcoming

cc: all counsel of record (via ECF)